

**BEFORE THE
PHYSICIAN ASSISTANT BOARD
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

**In the Matter of the First Amended
Accusation Against:**

Usmaan Mohammad Arshad, P.A.

Case No. 950-2016-001011

**Physician Assistant License
No. PA 51682**

Respondent

DECISION

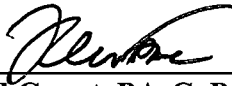
The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Physician Assistant Board, Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on March 1, 2019.

IT IS SO ORDERED February 1, 2019.

PHYSICIAN ASSISTANT BOARD

By:



Jed Grant, PA-C, President

1 XAVIER BECERRA
Attorney General of California
2 E. A. JONES III
Supervising Deputy Attorney General
3 EDWARD KIM
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7 *Attorneys for Complainant*

8 **BEFORE THE**
PHYSICIAN ASSISTANT BOARD
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the First Amended Accusation
Against:

12 **USMAAN MOHAMMAD ARSHAD, P.A.**
13 **2 West Fern Avenue**
Redlands, CA 92373-5916

14 **Physician Assistant License No. PA 51682,**
15
16 **Respondent.**

Case No. 950-2016-001011

OAH No. 2018080693

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Maureen L. Forsyth (Complainant) is the Executive Officer of the Physician Assistant
21 Board (Board). She brought this action solely in her official capacity and is represented in this
22 matter by Xavier Becerra, Attorney General of the State of California, by Edward Kim, Deputy
23 Attorney General.

24 2. Usmaan Mohammad Arshad, P.A. (Respondent) is represented in this proceeding by
25 attorney Elizabeth M. Brady, whose address is: 8880 Rio San Diego Drive, Suite 800, San Diego,
26 CA 92108-1642.

27 3. On or about June 20, 2014, the Board issued Physician Assistant License No.
28 PA 51682 to Respondent. His Physician Assistant License was in full force and effect at all times

1 relevant to the charges brought in First Amended Accusation No. 950-2016-001011, and will
2 expire on September 30, 2019, unless renewed.

3 JURISDICTION

4 4. First Amended Accusation No. 950-2016-001011 was filed before the Board, and is
5 currently pending against Respondent. The original accusation and all other statutorily required
6 documents were properly served on Respondent on May 22, 2018. Respondent timely filed his
7 Notice of Defense contesting the accusation. The accusation was subsequently amended by the
8 First Amended Accusation filed on December 5, 2018.

9 5. A copy of First Amended Accusation No. 950-2016-001011 is attached as Exhibit A
10 and incorporated herein by reference.

11 ADVISEMENT AND WAIVERS

12 6. Respondent has carefully read, fully discussed with counsel, and understands the
13 charges and allegations in First Amended Accusation No. 950-2016-001011. Respondent has
14 also carefully read, fully discussed with counsel, and understands the effects of this Stipulated
15 Settlement and Disciplinary Order.

16 7. Respondent is fully aware of his legal rights in this matter, including the right to a
17 hearing on the charges and allegations in the First Amended Accusation; the right to confront and
18 cross-examine the witnesses against him; the right to present evidence and to testify on his own
19 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the
20 production of documents; the right to reconsideration and court review of an adverse decision;
21 and all other rights accorded by the California Administrative Procedure Act and other applicable
22 laws.

23 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
24 every right set forth above.

25 CULPABILITY

26 9. Respondent understands and agrees that the charges and allegations in First Amended
27 Accusation No. 950-2016-001011, if proven at a hearing, constitute cause for imposing discipline
28 upon his Physician Assistant License. Respondent does not contest that, at an administrative

1 hearing, Complainant could establish a prima facie case with respect to the charges and
2 allegations contained in First Amended Accusation No. 950-2016-001011 and that he has thereby
3 subjected his license to disciplinary action. For the purpose of resolving the First Amended
4 Accusation without the expense and uncertainty of further proceedings, Respondent hereby gives
5 up his right to contest the charges in the First Amended Accusation.

6 10. Respondent agrees that if he ever petitions for early termination or modification of
7 probation, or if the Board ever petitions for revocation of probation, all of the charges and
8 allegations contained in First Amended Accusation No. 950-2016-001011 shall be deemed true,
9 correct and fully admitted by respondent for purposes of that proceeding or any other licensing
10 proceeding involving respondent in the State of California.

11 11. Respondent agrees that his Physician Assistant License is subject to discipline and he
12 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

13 CONTINGENCY

14 12. This stipulation shall be subject to approval by the Physician Assistant Board.
15 Respondent understands and agrees that counsel for Complainant and the staff of the Physician
16 Assistant Board may communicate directly with the Board regarding this stipulation and
17 settlement, without notice to or participation by Respondent or his counsel. By signing the
18 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek
19 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
20 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
21 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
22 action between the parties, and the Board shall not be disqualified from further action by having
23 considered this matter.

24 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
25 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
26 signatures thereto, shall have the same force and effect as the originals.

27 14. In consideration of the foregoing admissions and stipulations, the parties agree that
28 the Board may, without further notice or formal proceeding, issue and enter the following

1 Disciplinary Order:

2 **DISCIPLINARY ORDER**

3 IT IS HEREBY ORDERED that Physician Assistant License No. PA 51682 issued to
4 Respondent Usmaan Mohammad Arshad, P.A. is revoked. However, the revocation is stayed and
5 Respondent is placed on probation for ten (10) years on the following terms and conditions.

6 1. CONTROLLED DRUGS - DRUG ORDER AUTHORITY. Respondent shall not
7 administer, issue a drug order, or hand to a patient or possess any controlled substances as defined
8 by the California Uniform Controlled Substances Act. Respondent is prohibited from practicing
9 as a physician assistant until respondent provides documentary proof to the Board or its designee
10 that respondent's DEA permit has been surrendered to the Drug Enforcement Administration for
11 cancellation. Respondent shall surrender all controlled substance order forms to the supervising
12 physician. Thereafter, respondent shall not reapply for a new DEA permit without the prior
13 written consent of the Board or its designee.

14 2. CLINICAL DIAGNOSTIC EVALUATION (CDE). Within 30 days from the
15 effective date of the Decision and Order and thereafter as required by the Board, Respondent shall
16 undergo a CDE from a licensed practitioner who holds a valid, unrestricted license to conduct
17 CDEs, has three (3) years' experience in providing evaluations of health care professionals with
18 substance abuse disorders, and is approved by the Board. The evaluations shall be conducted in
19 accordance with accepted professional standards for conducting a substance abuse CDE.

20 Respondent shall undergo a CDE to determine whether the respondent has a substance
21 abuse problem and whether the respondent is a threat to himself or others. The evaluator shall
22 make recommendations for substance abuse treatment, practice restrictions, or other
23 recommendations related to the respondent's rehabilitation and safe practice.

24 Respondent shall not be evaluated by an evaluator that has a financial, personal, or business
25 relationship with the respondent within the last five (5) years. The evaluator shall provide an
26 objective, unbiased, and independent evaluation.

27 During the evaluation, if respondent is determined to be a threat to himself or others, the
28 evaluator shall notify the Board within 24 hours of such a determination.

1 Respondent may return to either full-time or part-time work if the Board determines he is fit
2 to do so based upon consideration of the CDE report and the following criteria:

- 3 • License type;
- 4 • Licensee's history;
- 5 • Documented length of sobriety/time that has elapsed since last
substance use;
- 6 • Scope and pattern of use;
- 7 • Treatment history;
- 8 • Medical history and current medical condition;
- 9 • Nature, duration and severity of substance abuse; and,
- 10 • Whether the licensee is a threat to himself or others.

11 The Board shall determine whether or not the respondent is safe to return to full-time or
12 part-time work, and what restrictions shall be imposed on the respondent. However, respondent
13 shall not return to practice until he has thirty days of negative drug tests.

14 If respondent is required to participate in inpatient, outpatient, or any other type of
15 treatment, the Board shall take into consideration the recommendation of the CDE, license type,
16 licensee's history, length of sobriety, scope and pattern of substance abuse, treatment history,
17 medical history, current medical condition, nature, duration and severity of substance abuse and
18 whether the licensee is a threat to himself or others.

19 In the event that any Condition Applying the Uniform Standards requires interpretation or
20 clarification, the Uniform Standards shall be controlling.

21 3. ABSTAIN FROM THE USE OF ALCOHOL. Respondent shall abstain completely
22 from the use of alcoholic beverages.

23 4. ABSTAIN FROM THE USE OF CONTROLLED SUBSTANCES AND
24 DANGEROUS DRUGS. Respondent shall abstain completely from personal use, possession,
25 injection, consumption by any route, including inhalation of all controlled substances as defined
26 in the California Uniform Controlled Substances Act. This prohibition does not apply to
27 medications lawfully prescribed to respondent for a bona fide illness or condition by a
28 practitioner licensed to prescribe such medications. Within fifteen (15) calendar days of
receiving any lawful prescription medications, respondent shall notify the recovery program in
writing of the following: prescriber's name, address, and telephone number; medication name and
strength, issuing pharmacy name, address, and telephone number. Respondent shall also provide

1 a current list of prescribed medication with the prescriber's name, address, and telephone number
2 on each quarterly report submitted. Respondent shall provide the probation monitor with a signed
3 and dated medical release covering the entire probation period.

4 Respondent shall identify for the Board's approval a single coordinating physician and
5 surgeon who shall be aware of respondent's history of substance abuse and who will coordinate
6 and monitor any prescriptions for respondent for dangerous drugs, and controlled substances.
7 Once a Board-approved physician and surgeon has been identified, respondent shall provide a
8 copy of the Initial Probationary License Decision and Order, Statement of Issues or Accusation
9 (as amended), Decision and Order, or Stipulated Decision and Order to the physician and
10 surgeon. The coordinating physician and surgeon shall report to the Board or its designee on a
11 quarterly basis respondent's compliance with this condition.

12 The Board may require that only a physician and surgeon who is a specialist in addictive
13 medicine be approved as the coordinating physician and surgeon.

14 If respondent has a positive drug screen for any substance not legally authorized,
15 respondent shall be contacted and instructed to leave work and ordered by the Board to cease any
16 practice and may not practice unless and until notified by the Board. The Board will notify
17 respondent's employer, if any, and worksite monitor, if any, that respondent may not practice. If
18 the Board files a petition to revoke probation or an accusation based upon the positive drug
19 screen, respondent shall be automatically suspended from practice pending the final decision on
20 the petition to revoke probation or accusation. This period of suspension will not apply to the
21 reduction of this probationary period.

22 5. DRUG AND ALCOHOL RECOVERY MONITORING PROGRAM. Within fifteen
23 (15) calendar days from the effective date of this Decision and Order, Respondent shall enroll,
24 participate in, and successfully complete the Board's drug and alcohol recovery monitoring
25 program at Respondent's cost until the drug and alcohol recovery monitoring program determines
26 that participation in the drug and alcohol recovery monitoring program is no longer necessary.

27 Respondent shall comply with all components of the drug and alcohol recovery monitoring
28 program. Respondent shall sign a release authorizing the drug and alcohol recovery monitoring

1 program to report all aspects of participation of the drug and alcohol recovery monitoring
2 program as requested by the Board or its designee.

3 Failure to comply with requirements of the drug and alcohol recovery monitoring program,
4 terminating the program without permission or being expelled for cause shall constitute a
5 violation of probation by respondent and shall be immediately suspended from the practice as a
6 physician assistant.

7 Probation shall be automatically extended until respondent successfully completes the
8 program.

9 6. BIOLOGICAL FLUID TESTING. Respondent shall immediately submit to and pay
10 for any random and directed biological fluid or hair sample, breath alcohol or any other mode of
11 testing required by the Board or its designee.

12 Respondent shall be subject to a minimum of fifty-two (52) random tests per year within
13 the first year of probation and a minimum of thirty six (36) random tests per year, for the duration
14 of the probationary term up to five years and a minimum of one (1) test per month in each year of
15 probation after the fifth year provided that there have been no positive test results during the
16 previous five (5) years.

17 The Board or its designee may require less frequent testing if any of the following applies:

- 18 • Where respondent has previously participated in a treatment or
19 monitoring program requiring testing, the board or its designee may
20 consider that prior testing record in applying the testing frequency
21 schedule described above;
- 22 • Where the basis for probation or discipline is a single incident or
23 conviction involving alcohol or drugs, or two incidents or convictions
24 involving alcohol or drugs that were at least seven (7) years apart, that did
25 not occur at work or on the way to or from work, the Board or its
26 designee may skip the first-year testing frequency requirement(s);
- 27 • Where respondent is not employed in any health care field, frequency
28 of testing may be reduced to a minimum of twelve (12) tests per year. If
respondent wishes to thereafter return to employment in a health care
field, respondent shall be required to test at least once a week for a period
of sixty (60) days before commencing such employment, and shall
thereafter be required to test at least once a week for a full year, before
respondent may be reduced to a testing frequency of no less than twenty-
four (24) tests per year;
- Where respondent has a demonstrated period of sobriety and/or non-

1 use, the Board or its designee may reduce the testing frequency to no less
2 than twenty-four (24) tests per year.

3 Respondent shall make daily contact as directed by the Board to determine if he must
4 submit to drug testing. Respondent shall have the test performed by a Board-approved laboratory
5 certified and accredited by the U.S. Department of Health and Human Services on the same day
6 that he is notified that a test is required. This shall ensure that the test results are sent
7 immediately to the Board. Failure to comply within the time specified shall be considered an
8 admission of a positive drug screen and constitute a violation of probation. If the test results in a
9 determination that the urine was too diluted for testing, the result shall be considered an
10 admission of a positive urine screen and constitutes a violation of probation. If a positive result is
11 obtained, the Board may require respondent to immediately undergo a physical examination and
12 to complete laboratory or diagnostic testing to determine if any underlying physical condition has
13 contributed to the diluted result and to suspend respondent's license to practice. Any such
14 examination or laboratory and testing costs shall be paid by respondent. If it is determined
15 respondent altered the test results, the result shall be considered an admission of a positive urine
16 screen and constitutes a violation of probation and respondent must cease practicing. Respondent
17 shall not resume practice until notified by the Board. If respondent tests positive for a banned
18 substance, respondent shall be contacted and instructed to leave work and ordered to cease all
19 practice. Respondent shall not resume practice until notified by the Board. All alternative drug
20 testing sites due to vacation or travel outside of California must be approved by the Board prior to
21 the vacation or travel.

22 7. FACILITATED GROUP SUPPORT MEETINGS. Within fifteen (15) days from the
23 effective date of the decision, respondent shall submit to the Board or its designee for prior
24 approval the name of one or more meeting facilitators. Respondent shall participate in facilitated
25 group support meetings within fifteen (15) days after notification of the Board's or designee's
26 approval of the meeting facilitator. When determining the type and frequency of required
27 facilitated group support meeting attendance, the Board or its designee shall give consideration to
28 the following:

- The licensee's history;

- The documented length of sobriety/time that has elapsed since substance abuse;
- The recommendation of the clinical evaluator;
- The scope and pattern of use;
- The licensee's treatment history; and ,
- The nature, duration, and severity of substance abuse.

Verified documentation of attendance shall be submitted by respondent with each quarterly report. Respondent shall continue attendance in such a group for the duration of probation unless notified by the Board that attendance is no longer required.

If a facilitated group support meeting is ordered, the group facilitator shall meet the following qualifications and requirements:

1. The group meeting facilitator shall have a minimum of three (3) years experience in the treatment and rehabilitation of substance abuse, and shall be licensed or certified by the state or other nationally certified organizations.
2. The group meeting facilitator shall not have a financial relationship, personal relationship, or business relationship with the licensee in the last one (1) year.
3. The group facilitator shall provide to the Board or its designee a signed document showing the licensee's name, the group name, the date and location of the meeting, the licensee's attendance, and the licensee's level of participation and progress.
4. The group meeting facilitator shall report any unexcused absence to the Board or its designee within twenty-four (24) hours.

8. WORK SITE MONITOR. Respondent shall have a worksite monitor as required by this term. The worksite monitor shall not have any current or former financial, personal, or familial relationship with the licensee, or other relationship that could reasonably be expected to compromise the ability of the monitor to render impartial and unbiased reports to the Board. If it is impractical for anyone but the licensee's employer or supervising physician to serve as the worksite monitor, this requirement may be waived by the Board. However, under no circumstances shall a licensee's worksite monitor be an employee of the licensee.

The worksite monitor's license scope of practice shall include the scope of practice of the licensee who is being monitored or be another health care professional if no monitor with like scope of practice is available.

The worksite monitor shall have an active unrestricted license, with no disciplinary action

1 within the last five (5) years.

2 The worksite monitor shall sign an affirmation that he has reviewed the terms and
3 conditions of the licensee's disciplinary order and agrees to monitor the licensee as set forth by
4 the Board.

5 The worksite monitor must adhere to the following required methods of monitoring the
6 licensee:

7 a) Have face-to-face contact with the licensee at least once per week in the work
8 environment or more frequently if required by the Board.

9 b) Interview other staff in the office regarding the licensee's behavior, if applicable.

10 c) Review the licensee's work attendance.

11 The worksite monitor shall report to the Board as follows:

12 Any suspected substance abuse must be verbally reported to the Board and the licensee's
13 employer within one (1) business day of occurrence. If the occurrence is not during the Board's
14 normal business hours the verbal report must be within one (1) hour of the next business day. A
15 written report shall be submitted to the Board within 48 hours of occurrence.

16 The worksite monitor shall complete and submit a written report monthly or as directed by
17 the Board. The report shall include: the licensee's name; license number; worksite monitor's
18 name and signature; worksite monitor's license number; worksite location(s); dates licensee had
19 face-to-face contact with monitor; staff interviewed if applicable; attendance report; any change
20 in behavior and/or personal habits; any indicators leading to suspected substance abuse.

21 The licensee shall complete the required consent forms and sign an agreement with the
22 worksite monitor and the Board to allow the Board to communicate with the worksite monitor.

23 If Respondent tests positive for a banned substance, the Board will immediately notify
24 Respondent's employer that the Respondent's license has been ordered to cease practice.

25 9. MAJOR VIOLATIONS. If respondent commits a major violation, respondent shall
26 immediately upon notification by the Board, cease practice until notified otherwise in writing by
27 the Board.

28 Major Violations include, but are not limited to, the following:

1. Failure to complete a Board-ordered program;
2. Failure to undergo a required CDE;
3. Committing multiple minor violations of probation conditions;
4. Treating a patient while under the influence of drugs or alcohol;
5. Committing any drug or alcohol offense that is a violation of the Business and Professions Code or state or federal law;
6. Failure to obtain biological testing for substance abuse;
7. Testing positive for a banned substance; and,
8. Knowingly using, making, altering, or possessing any object or product in such a way as to defraud a drug test designed to detect the presence of alcohol or a controlled substance.

10. APPROVAL OF SUPERVISING PHYSICIAN. Within 30 days of the effective date of this decision, respondent shall submit to the Board or its designee for its prior approval the name and license number of the supervising physician and a practice plan detailing the nature and frequency of supervision to be provided. Respondent shall not practice until the supervising physician and practice plan are approved by the Board or its designee.

Respondent shall have the supervising physician submit quarterly reports to the Board or its designee.

If the supervising physician resigns or is no longer available, respondent shall, within 15 days, submit the name and license number of a new supervising physician for approval. Respondent shall not practice until a new supervising physician has been approved by the Board or its designee.

11. NOTIFICATION OF EMPLOYER AND SUPERVISING PHYSICIAN. Respondent shall notify his current and any subsequent employer and supervising physician(s) of the discipline and provide a copy of the Accusation (as amended), Decision, and Order to each employer and supervising physician(s) during his period of probation, before accepting or continuing employment. Respondent shall ensure that each employer informs the Board or its designee, in writing within 30 days, verifying that the employer and supervising physician(s) have received a copy of the Accusation (as amended), Decision, and Order.

This condition shall apply to any change(s) in place of employment.

The respondent shall provide to the Board or its designee the names, physical addresses, mailing addresses, and telephone numbers of all employers, supervising physicians, and work site monitor, and shall inform the Board or its designee in writing of the facility or facilities at which

1 the person practices as a physician assistant.

2 Respondent shall give specific, written consent to the Board or its designee to allow the
3 Board or its designee to communicate with the employer, supervising physician, or work site
4 monitor regarding the licensee's work status, performance, and monitoring.

5 12. OBEY ALL LAWS. Respondent shall obey all federal, state, and local laws, and all
6 rules governing the practice of medicine as a physician assistant in California, and remain in full
7 compliance with any court ordered criminal probation, payments, and other orders.

8 13. QUARTERLY REPORTS: Respondent shall submit quarterly declarations under
9 penalty of perjury on forms provided by the Board or its designee, stating whether there has been
10 compliance with all the conditions of probation.

11 14. OTHER PROBATION REQUIREMENTS. Respondent shall comply with the
12 Board's probation unit. Respondent shall, at all times, keep the Board and probation unit
13 informed of respondent's business and residence addresses. Changes of such addresses shall be
14 immediately communicated in writing to the Board and probation unit. Under no circumstances
15 shall a post office box serve as an address of record, except as allowed by California Code of
16 Regulations 1399.523.

17 Respondent shall appear in person for an initial probation interview with Board or its
18 designee within 90 days of the decision. Respondent shall attend the initial interview at a time
19 and place determined by the Board or its designee.

20 Respondent shall, at all times, maintain a current and renewed physician assistant license.

21 Respondent shall also immediately inform the probation unit, in writing, of any travel to
22 any areas outside the jurisdiction of California which lasts, or is contemplated to last, more than
23 thirty (30) days.

24 15. INTERVIEW WITH MEDICAL CONSULTANT. Respondent shall appear in person
25 for interviews with the Board's medical or expert physician assistant consultant upon request at
26 various intervals and with reasonable notice.

27 16. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
28 its designee in writing within 15 calendar days of any periods of non-practice lasting more than

1 30 calendar days. Non-practice is defined as any period of time exceeding 30 calendar days in
2 which respondent is not practicing as a physician assistant. Respondent shall not return to
3 practice until the supervising physician is approved by the Board or its designee.

4 If, during probation, respondent moves out of the jurisdiction of California to reside or
5 practice elsewhere, including federal facilities, respondent is required to immediately notify the
6 Board in writing of the date of departure and the date of return, if any.

7 Practicing as a physician assistant in another state of the United States or federal
8 jurisdiction while on active probation with the physician assistant licensing authority of that state
9 or jurisdiction shall not be considered non-practice.

10 All time spent in a clinical training program that has been approved by the Board or its
11 designee, shall not be considered non-practice. Non-practice due to a Board ordered suspension
12 or in compliance with any other condition or probation, shall not be considered a period of non-
13 practice.

14 Any period of non-practice, as defined in this condition, will not apply to the reduction of
15 the probationary term.

16 Periods of non-practice do not relieve respondent of the responsibility to comply with the
17 terms and conditions of probation.

18 It shall be considered a violation of probation if for a total of two years, respondent fails to
19 practice as a physician assistant. Respondent shall not be considered in violation for non-practice
20 as long as respondent is residing and practicing as a physician assistant in another state of the
21 United States and is on active probation with the physician assistant licensing authority of that
22 state, in which case the two year period shall begin on the date probation is completed or
23 terminated in that state.

24 17. UNANNOUNCED CLINICAL SITE VISIT. The Board or its designee may make
25 unannounced clinical site visits at any time to ensure that respondent is complying with all terms
26 and conditions of probation.

27 18. CONDITION FULFILLMENT. A course, evaluation, or treatment completed after
28 the acts that gave rise to the charges in the accusation (as amended), but prior to the effective date

1 of the Decision may, in the sole discretion of the Board or its designee, be accepted towards the
2 fulfillment of the condition.

3 19. COMPLETION OF PROBATION. Respondent shall comply with all financial
4 obligations (e.g., cost recovery, probation costs) no later than 60 calendar days prior to the
5 completion of probation. Upon successful completion of probation, respondent's license will be
6 fully restored.

7 20. VIOLATION OF PROBATION. If respondent violates probation in any respect, the
8 Board, after giving respondent notice and the opportunity to be heard, may revoke probation and
9 carry out the disciplinary order that was stayed. If an accusation or petition to revoke probation is
10 filed against respondent during probation, the Board shall have continuing jurisdiction until the
11 matter is final, and the period of probation shall be extended until the matter is final.

12 21. COST RECOVERY. The respondent is hereby ordered to reimburse the Physician
13 Assistant Board the amount of \$2,740.00 for its costs, provided that, Respondent has the option of
14 either paying the full amount within 90 days from the effective date of this decision, or paying
15 twenty-four (24) monthly consecutive installments of \$115.00 beginning on the effective date of
16 this decision and on the first of each month thereafter. Failure to make an agreed upon monthly
17 payment or to reimburse the Board for its costs pursuant to this condition shall constitute a
18 violation of the probation order. The filing of bankruptcy by the respondent shall not relieve the
19 respondent of his/her responsibility to reimburse the Board for its investigative costs.

20 22. PROBATION MONITORING COSTS. Respondent shall pay the costs associated
21 with probation monitoring each and every year of probation, as designated by the Board, which
22 may be adjusted on an annual basis. The costs shall be made payable to the Physician Assistant
23 Board and delivered to the Board no later than January 31 of each calendar year.

24 23. VOLUNTARY LICENSE SURRENDER. Following the effective date of this
25 probation, if respondent ceases practicing due to retirement, health reasons, or is otherwise unable
26 to satisfy the terms and conditions of probation, respondent may request, in writing, the
27 voluntarily surrender of respondent's license to the Board. Respondent's written request to
28 surrender his license shall include the following: his name, license number, case number, address

1 of record, and an explanation of the reason(s) why respondent seeks to surrender his license. The
2 Board reserves the right to evaluate the respondent's request and to exercise its discretion whether
3 to grant the request, or to take any other action deemed appropriate and reasonable under the
4 circumstances. Respondent shall not be relieved of the requirements of his probation unless the
5 Board or its designee notifies respondent in writing that respondent's request to surrender his
6 license has been accepted. Upon formal acceptance of the surrender, respondent shall, within 15
7 days, deliver respondent's wallet and wall certificate to the Board or its designee and shall no
8 longer practice as a physician assistant. Respondent will no longer be subject to the terms and
9 conditions of probation and the surrender of respondent's license shall be deemed disciplinary
10 action. If respondent re-applies for a physician assistant license, the application shall be treated
11 as a petition for reinstatement of a revoked license.

12
13
14 ACCEPTANCE

15 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
16 discussed it with my attorney, Elizabeth M. Brady. I understand the stipulation and the effect it
17 will have on my Physician Assistant License. I enter into this Stipulated Settlement and
18 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
19 Decision and Order of the Physician Assistant Board.

20 DATED: _____

21 USMAAN MOHAMMAD ARSHAD, P.A.
22 *Respondent*

23 I have read and fully discussed with Respondent USMAAN MOHAMMAD ARSHAD,
24 P.A. the terms and conditions and other matters contained in the above Stipulated Settlement and
25 Disciplinary Order. I approve its form and content.

26 DATED: _____

27 ELIZABETH M. BRADY
28 *Attorney for Respondent*

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Physician Assistant Board.

Dated:

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General

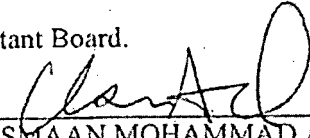
EDWARD KIM
Deputy Attorney General
Attorneys for Complainant

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1 of record, and an explanation of the reason(s) why respondent seeks to surrender his license. The
2 Board reserves the right to evaluate the respondent's request and to exercise its discretion whether
3 to grant the request, or to take any other action deemed appropriate and reasonable under the
4 circumstances. Respondent shall not be relieved of the requirements of his probation unless the
5 Board or its designee notifies respondent in writing that respondent's request to surrender his
6 license has been accepted. Upon formal acceptance of the surrender, respondent shall, within 15
7 days, deliver respondent's wallet and wall certificate to the Board or its designee and shall no
8 longer practice as a physician assistant. Respondent will no longer be subject to the terms and
9 conditions of probation and the surrender of respondent's license shall be deemed disciplinary
10 action. If respondent re-applies for a physician assistant license, the application shall be treated
11 as a petition for reinstatement of a revoked license.

12
13
14 ACCEPTANCE

15 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
16 discussed it with my attorney, Elizabeth M. Brady. I understand the stipulation and the effect it
17 will have on my Physician Assistant License. I enter into this Stipulated Settlement and
18 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
19 Decision and Order of the Physician Assistant Board.

20 DATED: 12/12/2018 
21 USMAAN MOHAMMAD ARSHAD, P.A.
22 *Respondent*

23 I have read and fully discussed with Respondent USMAAN MOHAMMAD ARSHAD,
24 P.A. the terms and conditions and other matters contained in the above Stipulated Settlement and
25 Disciplinary Order. I approve its form and content.

26 DATED: Dec. 12, 2018 
27 ELIZABETH M. BRADY
28 *Attorney for Respondent*

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Physician Assistant Board.

Dated: 12/12/18

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General



EDWARD KIM
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

First Amended Accusation No. 950-2016-001011

1 XAVIER BECERRA
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2 E. A. JONES III
Supervising Deputy Attorney General
3 EDWARD KIM
Deputy Attorney General
4 State Bar No. 195729
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7 *Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO DEC. 5 2018
BY JWA/KEN ANALYST

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BEFORE THE
PHYSICIAN ASSISTANT BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the First Amended Accusation
Against:

Case No. 950-2016-001011

USMAAN MOHAMMAD ARSHAD, P.A.
2 W. Fern Avenue
Redlands, CA 92373-5916

FIRST AMENDED
ACCUSATION

Physician Assistant License No. PA51682,
Respondent.

Complainant alleges:

PARTIES

1. Maureen L. Forsyth (Complainant) brings this First Amended Accusation
(hereinafter, "Accusation") solely in her official capacity as the Executive Officer of the
Physician Assistant Board, Department of Consumer Affairs. This amendment corrects the case
number to reference Case No. 950-2016-001011.

2. On or about June 20, 2014, the Physician Assistant Board issued Physician Assistant
License Number PA51682 to Usmaan Mohammad Arshad, P.A. (Respondent). The Physician
Assistant License was in full force and effect at all times relevant to the charges brought herein
and will expire on September 30, 2019, unless renewed.

JURISDICTION

3. This Accusation is brought before the Physician Assistant Board (Board), Department

1 of Consumer Affairs, under the authority of the following laws. All section references are to the
2 Business and Professions Code unless otherwise indicated.

3 4. Section 3527 of the Code states, in pertinent part:

4 “(a) The board may order the denial of an application for, or the issuance
5 subject to terms and conditions of, or the suspension or revocation of, or the
6 imposition of probationary conditions upon a physician assistant license after a
7 hearing as required in Section 3528 for unprofessional conduct which includes, but is
8 not limited to, a violation of this chapter, a violation of the Medical Practice Act, or a
9 violation of the regulations adopted by the board or the Medical Board of California.

10 “(b) The board may order the denial of an application for, or the suspension or
11 revocation of, or the imposition of probationary conditions upon, an approved
12 program after a hearing as required in Section 3528 for a violation of this chapter or
13 the regulations adopted pursuant thereto.

14 “(c) The Medical Board of California may order the denial of an application
15 for, or the issuance subject to terms and conditions of, or the suspension or revocation
16 of, or the imposition of probationary conditions upon, an approval to supervise a
17 physician assistant, after a hearing as required in Section 3528, for unprofessional
18 conduct, which includes, but is not limited to, a violation of this chapter, a violation
19 of the Medical Practice Act, or a violation of the regulations adopted by the board or
20 the Medical Board of California.

21 “...

22 “(f) The board may order the licensee to pay the costs of monitoring the
23 probationary conditions imposed on the license.

24 “(g) The expiration, cancellation, forfeiture, or suspension of a physician
25 assistant license by operation of law or by order or decision of the board or a court of
26 law, the placement of a license on a retired status, or the voluntary surrender of a
27 license by a licensee shall not deprive the board of jurisdiction to commence or
28 proceed with any investigation of, or action or disciplinary proceeding against, the

1 licensee or to render a decision suspending or revoking the license.”

2 5. Section 3528 of the Code states:

3 “Any proceedings involving the denial, suspension or revocation of the
4 application for licensure or the license of a physician assistant, the application for
5 approval or the approval of a supervising physician, or the application for approval or
6 the approval of an approved program under this chapter shall be conducted in
7 accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3
8 of Title 2 of the Government Code.”

9 6. Section 3531 of the Code states:

10 “A plea or verdict of guilty or a conviction following a plea of nolo contendere
11 made to a charge of a felony or of any offense which is substantially related to the
12 qualifications, functions, or duties of the business or profession to which the license
13 was issued is deemed to be a conviction within the meaning of this chapter. The
14 board may order the license suspended or revoked, or shall decline to issue a license
15 when the time for appeal has elapsed, or the judgment of conviction has been
16 affirmed on appeal or when an order granting probation is made suspending the
17 imposition of sentence, irrespective of a subsequent order under the provisions of
18 Section 1203.4 of the Penal Code allowing such person to withdraw his plea of guilty
19 and to enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing
20 the accusation, information or indictment.”

21 7. California Code of Regulations, title 16, section 1399.525, states, in pertinent part:

22 “For the purposes of the denial, suspension or revocation of a license or
23 approval pursuant to division 1.5 (commencing with section 475) of the code, a crime
24 or act shall be considered to be substantially related to the qualifications, functions or
25 duties of a person holding a license under the Physician Assistant Practice Act if to a
26 substantial degree it evidences present or potential unfitness of a person holding such
27 a license to perform the functions authorized by the license or approval in a manner
28 consistent with the public health, safety or welfare. Such crimes or acts shall include,

1 but are not limited to, the following:

2 “(a) Violating or attempting to violate, directly or indirectly, or assisting in or
3 abetting the violation of, or conspiring to violate any provision or term of the Medical
4 Practice Act.

5 “(b) Violating or attempting to violate, directly or indirectly, or assisting in or
6 abetting the violation of, or conspiring to violate any provision or term of the
7 Physician Assistant Practice Act.

8 “...

9 “(i) Conviction for driving under the influence of drugs or alcohol.”

10 **MEDICAL PRACTICE ACT**

11 8. Section 2227 of the Code provides that a licensee who is found guilty under the
12 Medical Practice Act may have his or her license revoked, suspended for a period not to exceed
13 one year, placed on probation and required to pay the costs of probation monitoring, or such other
14 action taken in relation to discipline as the Board deems proper.

15 9. Section 2234 of the Code, states:

16 “The board shall take action against any licensee who is charged with unprofessional
17 conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not
18 limited to, the following:

19 “(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the
20 violation of, or conspiring to violate any provision of this chapter.

21 “(b) Gross negligence.

22 “(c) Repeated negligent acts. To be repeated, there must be two or more negligent acts or
23 omissions. An initial negligent act or omission followed by a separate and distinct departure from
24 the applicable standard of care shall constitute repeated negligent acts.

25 “(1) An initial negligent diagnosis followed by an act or omission medically appropriate
26 for that negligent diagnosis of the patient shall constitute a single negligent act.

27 “(2) When the standard of care requires a change in the diagnosis, act, or omission that
28 constitutes the negligent act described in paragraph (1), including, but not limited to, a

1 reevaluation of the diagnosis or a change in treatment, and the licensee's conduct departs from the
2 applicable standard of care, each departure constitutes a separate and distinct breach of the
3 standard of care.

4 "(d) Incompetence.

5 "(e) The commission of any act involving dishonesty or corruption which is substantially
6 related to the qualifications, functions, or duties of a physician and surgeon.

7 "(f) Any action or conduct which would have warranted the denial of a certificate.

8 "(g) The practice of medicine from this state into another state or country without meeting
9 the legal requirements of that state or country for the practice of medicine. Section 2314 shall not
10 apply to this subdivision. This subdivision shall become operative upon the implementation of the
11 proposed registration program described in Section 2052.5.

12 "(h) The repeated failure by a certificate holder, in the absence of good cause, to attend and
13 participate in an interview by the board. This subdivision shall only apply to a certificate holder
14 who is the subject of an investigation by the board."

15 10. Section 2239 of the Code states:

16 "(a) The use or prescribing for or administering to himself or herself, of any controlled
17 substance; or the use of any of the dangerous drugs specified in Section 4022, or of alcoholic
18 beverages, to the extent, or in such a manner as to be dangerous or injurious to the licensee, or to
19 any other person or to the public, or to the extent that such use impairs the ability of the licensee
20 to practice medicine safely or more than one misdemeanor or any felony involving the use,
21 consumption, or self-administration of any of the substances referred to in this section, or any
22 combination thereof, constitutes unprofessional conduct. The record of the conviction is
23 conclusive evidence of such unprofessional conduct.

24 "(b) A plea or verdict of guilty or a conviction following a plea of nolo contendere is
25 deemed to be a conviction within the meaning of this section. The Division of Medical Quality¹
26 may order discipline of the licensee in accordance with Section 2227 or the Division of Licensing

27
28 ¹ Pursuant to Business and Professions Code section 2002, "Division of Medical Quality"
or "Division" shall be deemed to refer to the Medical Board of California.

1 may order the denial of the license when the time for appeal has elapsed or the judgment of
2 conviction has been affirmed on appeal or when an order granting probation is made suspending
3 imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4
4 of the Penal Code allowing such person to withdraw his or her plea of guilty and to enter a plea of
5 not guilty, or setting aside the verdict of guilty, or dismissing the accusation, complaint,
6 information, or indictment.”

7 11. Section 822 of the Code, states:

8 “If a licensing agency determines that its licensee's ability to practice his or her profession
9 safely is impaired because the licensee is mentally ill, or physically ill affecting competency, the
10 licensing agency may take action by any one of the following methods:

11 “(a) Revoking the licensee's certificate or license.

12 “(b) Suspending the licensee's right to practice.

13 “(c) Placing the licensee on probation.

14 “(d) Taking such other action in relation to the licensee as the licensing agency in its
15 discretion deems proper.

16 “The licensing agency shall not reinstate a revoked or suspended certificate or license until
17 it has received competent evidence of the absence or control of the condition which caused its
18 action and until it is satisfied that with due regard for the public health and safety the person's
19 right to practice his or her profession may be safely reinstated.”

20 12. Section 2238 of the Code states:

21 “A violation of any federal statute or federal regulation or any of the statutes or regulations
22 of this state regulating dangerous drugs or controlled substances constitutes unprofessional
23 conduct.”

24 **HEALTH AND SAFETY CODE**

25 13. Section 11170 of the Health and Safety Code states:

26 “No person shall prescribe, administer, or furnish a controlled substance for himself.”

27 **COST RECOVERY**

28 14. Section 125.3 of the Code states, in pertinent part, that the Board may request the

1 administrative law judge to direct a licentiate found to have committed a violation or violations of
2 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
3 enforcement of the case.

4 **FIRST CAUSE FOR DISCIPLINE**

5 **(Conviction of a Crime Substantially Related to the Qualifications,
6 Functions or Duties of a Physician Assistant)**

7 15. Respondent has subjected his Physician Assistant License to disciplinary action under
8 sections 3527, 2227 and 2234, as defined by section 3531, of the Code, and title 16 of the
9 California Code of Regulations, section 1399.525, subdivision (i), in that he has been convicted
10 of a crime substantially related to the qualifications, functions, or duties of a Physician Assistant,
11 as more particularly alleged hereinafter:

12 16. On or about July 7, 2016, at approximately 1:00 a.m., Respondent was involved in a
13 roll over vehicle accident in the vicinity of the State Route 38, north of Bryant Street in an
14 unincorporated part of San Bernardino. An officer from the California Highway Patrol responded
15 to a roll over traffic collision report, arrived on scene at approximately 1:20 a.m. The officer
16 located Respondent, who was approximately 200 feet east of his vehicle, at approximately 1:42
17 a.m.

18 17. Respondent admitted to the officer that he drove his vehicle at the time of the solo
19 vehicle accident and suffered a seat belt injury across his left collarbone from his seatbelt. While
20 the officer was speaking to Respondent, he could smell the odor of an alcoholic beverage emitting
21 from Respondent's breath and person. He also observed that Respondent's eyes were bloodshot
22 and watery and his speech was fast and slurred. When asked about whether he had been drinking,
23 Respondent admitted that he had one to twelve cans of beer.

24 18. Later, Officer J.C. administered several field sobriety tests (FSTs) to Respondent.
25 During the FSTs, Respondent exhibited signs of impairment.

26 19. Officer J.C. placed Respondent under arrest for suspicion of violating Vehicle Code
27 section 23152, subdivision (a) [driving while under the influence].

28 20. At approximately 2:02 a.m. and 2:07 a.m. Respondent underwent preliminary alcohol

1 screening tests. The results revealed blood alcohol concentrations of 0.207 and 0.206,
2 respectively. He also underwent a blood screening test based upon a sample obtained at
3 approximately 3:21 a.m., the results of which revealed blood alcohol concentrations of 0.155.

4 21. On or about August 15, 2015 in the case entitled, *The People of the State of California*
5 *v. Usmaan Mohamed Arshad*, San Bernardino County Superior Court Case No. MSB17005586,
6 wherein Respondent was charged with a violation of Vehicle Code section 23152, subdivision (a)
7 [driving while under the influence](Count 1) and section 23152, subdivision (b) [driving while
8 under the influence of alcohol of .08 or more](Count 2), he pled nolo contendere to Count 2, a
9 misdemeanor. Respondent was sentenced to three (3) years of probation subject to various terms
10 and conditions, including not to drive a motor vehicle with any measurable amount of alcohol in
11 his system.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Use of Alcohol to an Extent Dangerous**
14 **or Injurious to Himself, Others, or the Public)**

15 22. Respondent has further subjected his Physician Assistant License to disciplinary
16 action under sections 3527, 2227 and 2234, as defined by section 2239, subdivision (a), of the
17 Code, in that he used alcoholic beverages; to the extent, or in such a manner, as to be dangerous
18 or injurious to himself, others, or the public. The circumstances are as follows:

19 23. The allegations of the First Cause for Discipline are incorporated herein by reference
20 as if fully set forth.

21 **THIRD CAUSE FOR DISCIPLINE**

22 **(Violation of Drug Statute; Self Use)**

23 24. Respondent is subject to disciplinary action under section 2238 of the Code and
24 sections 11170 of the Health and Safety Code in that Respondent administered a controlled
25 substance to himself and unlawfully possessed a controlled substance. The circumstances are as
26 follows:

27 25. The allegations of the First and Second Causes for Discipline are incorporated herein
28 by reference as if fully set forth.

1 26. In addition, on or about April 16, 2018, an investigator of the Department of
2 Consumer Affairs ("Investigator") interviewed Respondent. During the interview, Respondent
3 admitted to engaging in a period of heavy daily alcohol use (of primarily beer) during the time
4 period leading up to his arrest for driving under the influence in 2016. He also admitted during
5 the interview that he prescribed and administered to himself, Naltrexone,² and he also admitted
6 that he obtained and used for himself, Librium³ from a relative's pharmacy office. According to
7 Respondent, each drug was used to treat his issues with alcohol and the possible effect of
8 withdrawal. In or around, March 21, 2018, the Investigator obtained a urine sample from
9 Respondent while he was at work. The results of a biological fluid drug screen indicated that
10 Respondent's urine was positive for Amphetamine, benzodiazepine use, Ethyl glucuronide (EtG)
11 and ethyl sulfate (EtS), Ethanol and Naltrexone.

12 **FOURTH CAUSE FOR DISCIPLINE**

13 **(Violation of a Provision or Provisions of the Medical Practice Act)**

14 27. Respondent has further subjected his Physician Assistant License to disciplinary
15 action under sections 3527, 2227, and 2234, of the Code, and title 16 of the California Code of
16 Regulations, section 1399.525, subdivision (a), in that he has violated a provision or provisions of

17 ² Naltrexone is a medication primarily used to manage alcohol dependence and opioid
18 dependence. It is sold under the brand names, ReVia and Vivitrol. It is a dangerous drug as
defined in Business and Professions code section 4022.

19 ³ Chlordiazepoxide is a sedative and hypnotic medication of the benzodiazepine class; it is
20 used to treat anxiety, insomnia and withdrawal symptoms from alcohol and/or drug abuse. It is
21 sold under the Librium brand name. It is a dangerous drug as defined in Business and Professions
22 Code section 4022, and a Schedule IV controlled substance and narcotic as defined by Health and
Safety Code section 11057, subdivision (d)(5). Chlordiazepoxide is a drug that is very frequently
involved in drug intoxication, including overdose. Chlordiazepoxide overdose is considered a
medical emergency and, in general, requires the immediate attention of medical personnel.

23 Benzodiazepines are a class of drugs that produce central nervous system (CNS)
24 depression. They are used therapeutically to produce sedation, induce sleep, relieve anxiety and
25 muscle spasms, and to prevent seizures. They are most commonly used to treat insomnia and
anxiety. There is the potential for dependence on and abuse of benzodiazepines particularly by
26 individuals with a history of multi-substance abuse. Benzodiazepines can be taken in overdoses
and can cause dangerous deep unconsciousness. When combined with other central nervous
27 system (CNS) depressants such as alcoholic drinks and opioids, the potential for toxicity and fatal
overdose increases. Benzodiazepines are commonly misused and taken in combination with other
28 drugs of abuse. Alprazolam (e.g., Xanax), lorazepam (e.g., Ativan), clonazepam (e.g., Klonopin),
diazepam (e.g., Valium), and temazepam (e.g., Restoril) are among the most prescribed, as well
as the most frequently encountered benzodiazepines on the illicit market.

1 the Medical Practice Act. The circumstances are as follows:

2 28. The allegations of the First, Second and Third Causes for Discipline are incorporated
3 herein by reference as if fully set forth.

4 **FIFTH CAUSE FOR DISCIPLINE**

5 **(Violation of a Provision or Provisions of the Physician Assistant Practice Act)**

6 29. Respondent has further subjected his Physician Assistant License to disciplinary
7 action under sections 3527, 2227, and 2234, of the Code, and title 16 of the California Code of
8 Regulations, section 1399.525, subdivision (b), in that he has violated a provision or provisions of
9 the Physician Assistant Practice Act. The circumstances are as follows:

10 30. The allegations of the First, Second, Third and Fourth Causes for Discipline are
11 incorporated herein by reference as if fully set forth.

12 **SIXTH CAUSE FOR DISCIPLINE**

13 **(General Unprofessional Conduct)**

14 31. Respondent is subject to disciplinary action under sections 3527 and 2234 of the
15 Code, generally, in that he committed unprofessional conduct. The circumstances are as follows:

16 32. The allegations of the First, Second, Third, Fourth and Fifth Causes for Discipline are
17 incorporated herein by reference as if fully set forth.

18 ///

1 PRAYER


2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Physician Assistant Board issue a decision:

4 1. Revoking or suspending Physician Assistant License Number PA51682, issued to
5 respondent Usmaan Mohammad Arshad, P.A.;

6 2. Ordering respondent Usmaan Mohammad Arshad, P.A. to pay the Physician
7 Assistant Board the reasonable costs of the investigation and enforcement of this case, pursuant to
8 Business and Professions Code section 125.3; and,

9 3. Taking such other and further action as deemed necessary and proper.

10 DATED: December 5, 2018


MAUREEN L. FORSYTH
Executive Officer
Physician Assistant Board
Department of Consumer Affairs
State of California
Complainant

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